DOCUMENT RESUME

ED 130 801 PS 008 956

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TITLE Developing a Family Impact Statement.
INSTITUTION Foundation for Child Development, New York, N.Y.
PUB DATE May 76
NOTE 21p.

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS Child Development; Child Welfare; *Family (Sociological Unit); Foreign Countries; *Government Role; *Models; Policy; *Social Planning; *Social Services; *Social Welfare; Socioeconomic Influences
IDENTIFIERS *Family Impact Statements

ABSTRACT

This report concerns the feasibility of developing and putting into operation a family impact statement. Creation of a process for assessing the potential effect of policies on families is seen as particularly important now, given the current state of the economy, projected funding cutbacks for social programs, and the increasing need to identify priorities. The report explores: (1) the potential value of a family impact statement; (2) the scientific feasibility of defining and putting it into operation; (3) the knowledge base and analytic framework for the statement; and (4) the system or process that could produce it. The report is based on interviews with a small number of experts, both scholars and government officials in such fields as child development, family sociology, family and child welfare, evaluation research social indicators, political science, policy analysis and family policy, and on a review of relevant literature. It also draws on interviews connected with related research activities in the United States and Europe. The purpose of developing family impact statements is the improvement of the conditions of families in the United States. (Author/MS)

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Developing a Family Impact Statement

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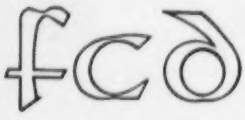

An Occasional Paper from the
FOUNDATION FOR CHILD DEVELOPMENT

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To advance its cause of improving the lives of children and their families, the Foundation for Child Development encourages the social and behavioral sciences to study various aspects of the child and his environment.

The Foundation supports scholars from the law, from economics and sociology, and from other disciplines not traditionally concerned with children, to develop new perspectives on the institutions that have a major effect on the lives of children and their families. The Foundation has a major interest in the translation of research findings into a form that can affect policies involving children and families, and in supporting efforts to assess children's attitudes and feelings about themselves, their families, and their lives. In addition, the Foundation supports those who play an advocacy role on behalf of children or who seek to develop patterns of improved services for the child and his family.

The Foundation became a private foundation in 1944. It was originally incorporated as a voluntary agency in New York in 1900 and established as the Association for the Aid of Crippled Children in 1908. The Association was publicly supported by voluntary contributions until 1944, when substantial funds were received from the estate of Milo M. Belding.

In recognition of the nature of its evolving program and of its stature as a grant-making organization, the Association changed its name in 1972 to the Foundation for Child Development.

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May 1976

Introduction

This report concerns the feasibility of developing and putting into operation a family impact statement. The report explores:

— the potential value of such a statement;
— the scientific feasibility of defining and putting it into operation;
— the knowledge base and analytic framework of the statement;
— the system or process that could produce it.

The report is based on interviews with a small number of experts, both scholars and government officials, in such fields as child development, family sociology, family and child welfare, evaluation research, social indicators, political science, policy analysis, and family policy, and on a review of relevant literature. It also draws on interviews connected with related research activities in the United States and Europe.[1] The purpose of developing family impact statements is the improvement of the conditions of families in the United States. The concern with family impact is not a concern with technology but with quality of life.

The Potential Value of a Family Impact Statement

There is widespread interest in the idea of a family impact statement and enthusiastic support for efforts to develop a prototype and experiment with it. Creation of a process for assessing the potential effect of policies on families is seen as particularly important now, given the current state of the economy, projected funding cutbacks for social programs, and the increasing need to identify priorities. The potential constituency for such a statement is large, and includes legislators; administrators at national, state, and local levels; scholars; and the concerned public. How this constituency could and should be mobilized remains a question to be explored by others.

Within the last few years, there has been increased discussion of the development of a family impact statement comparable in function to the Environmental Impact Statement mandated in the 1971 Environmental Policy Act. Underlying the discussion is a feeling that public policy does not take adequate account of the needs and problems of families and children. A related concern is

that those who would influence policy often are frustrated when faced with the reality of policy development and decision-making.[2]

Senator Walter F. Mondale has urged the establishment of a commission that would prepare and issue a family impact statement on selected federal legislative proposals. Edward F. Zigler, former head of the Office of Child Development, testifying before the Senate Subcommittee on Children and Youth on the need for an explicit family policy, stated that one aspect of developing such a policy was the need for ". . . the continuous analyses of the impact of other governmental policies for their effects on family life, so that any cost-benefit analysis of these policies would include in its equations the factor of whether the policy in question helps or hurts American families."[3] During these same hearings, experts in the fields of child development, family sociology, and anthropology also urged that concerted efforts be made to develop formal procedures for assessing the impact of public policies and legislation on families.[4]

Yet, in spite of this interest in assessing the potential impact of legislation on families and children, there has been little specification of what is meant by the term. What is "family impact?" How could family impact be assessed? For what purpose? How would differential effects on various family members be taken into account? Who would or should do the assessing? Who would be the audience for the report on such an assessment?

Defining a Family Impact Statement

For the purpose of this report, the following definitions are employed:

- A family is a unit of one or two parents or legal guardian(s) with a dependent child (under age 18).
- Impact is the outcome or significance of specific actions. Impact may be direct or indirect, intended or unintended, positive or negative.
- Thus, family impact describes the consequences or significance for families of specific actions.
- A family impact analysis is the framework in which specific activities such as legislation, policies, programs, and regulations are assessed with regard to their consequences for families.
- A family impact statement is one product of family-impact analysis.

— A family impact statement is defined as a report prepared by an organization or individual(s) reviewing and analyzing a proposed law, policy, regulation, or project with a view to assessing its potential effects on all families or on certain categories of families.

Obviously, there are difficulties inherent in adopting a family perspective rather than a focus on individual family members, such as children. Preliminary exploration indicates, however, that an examination of the potential effects of public policy on children alone would be an error. The family continues to be the primary environment for most children, and most children live in and with their families. What affects families includes much of what affects children. And, too, the family as an institution may be the most efficient and effective way to have an impact on children if new interventions are contemplated, as suggested by recent research on such programs as Home Start.

Problems of Developing a Family Impact Statement

While most persons interviewed were favorable to the idea of a family impact statement (although they often disagreed as to its definition), there were considerable differences expressed as to how such a statement could or should be put into effect and the problems in so doing. Among the main problems cited were:

— The absence of guidelines for identifying which laws, policies, and administrative regulations should be reviewed. Without well-defined criteria, there are no limits to what could be considered as potentially having some effect on families and children.*

— Differences of opinion among representatives of different disciplines as to which should form the main bases for developing a family impact statement.

— Inadequate knowledge and differences of opinion regarding what is, or is not, good for families and children; or in how to achieve certain goals, once identified.

— Inadequacies in technical skills needed to measure impact or predict consequences.

— Difficulties in assessing differential impact within the family or among family members.

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*Where government actions are concerned, the field becomes the whole universe of government policies. In effect, this suggests the need for a new organizing principle; yet current knowledge has not developed to this point. For further discussion of this subject, see "The Content of a Family Impact Statement" and the discussion of family policy.

Discussion of these problems constitutes the bulk of this report. Questions of administrative and political feasibility will not be dealt with here.[5]

There have been numerous efforts to monitor legislation, policies, programs, and regulations affecting children, families, and individuals. Any attempt to establish a family impact statement must build on these experiences.

The Content of a Family Impact Statement — Many fields of knowledge are needed to develop and put into effect a family impact statement. Moreover, a broad, multidisciplinary perspective is essential, even though not all fields would be equally important at all times.

First, child and human development, child psychology, and family sociology are central to the task of developing a family impact statement, even though these fields have major inadequacies. There are both limitations in knowledge and differences in conclusions regarding, for example, the effects on families and children of changes in the structures, roles, and resources of families, as well as in their environments. Yet, these issues are at the very heart of the legislation that concerns us. Initial efforts by this project to identify general agreement on the potential effects on families and children — as differentiated from firm knowledge — served only to underscore the absence of consensus. Questions put to scholars in these fields included:

— What are the consequences of a rising divorce rate on children? Some answered by talking of the negative consequences of family breakup; others spoke of the benign effects of reducing tension; most said, "It depends. It's a mixed picture. Clearly, norms are changing."

— Given the objective of improving the health of children, with limited resources available, which program should have priority? Some urged improving child-health services, while others recommended expansion of child-nutrition programs.

— What factors are most critical for the improvement of child-care programs in the United States? Some stressed the importance of enforcing rigorous standards to ensure high quality programs — particularly in regard to staff-child ratios. Others questioned the existence of any evidence supporting the advantages of low staff-child ratios and said instead that they only added to program costs and impeded program development at the expense of children's needs and well-being.

Thus, it is clear that developers of a family impact statement must grapple with the fact that: (1) there is limited knowledge of cause and effect in this area, and (2) very real differences exist

among scholars as to what is or is not good for families and children. How these problems might be resolved will be discussed below.

A second field of knowledge that must be involved is that of social indicators, a field that is destined to grow and become even more significant in the development of family policy than it is today. Drs. Zill and Brim use the term "childhood social indicators" to describe measures of change in the health, behavior, and well-being of children and in the condition of their lives.[6] The authors indicate that to produce the needed data requires identical measures applied repeatedly over time to comparable populations of children.

If there were now available valid and reliable childhood social indicators that dealt with most aspects of child life, there would already exist a firm basis for a family impact statement. One could refer to changing child states as reflected in indicators. Lacking a system of indicators at present, developers of a family impact statement must draw on whatever usable social indicators do exist and collaborate with efforts to improve the state of the art.

The third field of knowledge needed for a family impact statement is family policy, a field in which a considerable amount of new knowledge is emerging.[7] Family policy focuses on those issues that are most central to the substance of a family impact statement, providing the linkage between specialized knowledge of children and families on the one hand and public policy as it affects families and children on the other. Clarification of the meaning and ramifications of family policy will make it possible to sharpen the focus of the family impact statement and to pick targets for particular attention. Of special importance is the concern in family policy with the identification of government actions that affect families and the presence or absence of consistency among these actions.

Coping with Uncertainty — Given the limitations in knowledge and the absence of consensus described above, how can a family impact statement be developed? Clearly, we are not so ignorant that the whole enterprise should be labeled "unfeasible." Nor, however, are we so knowledgeable that we can establish a clear-cut and rigorous process of inquiry that would provide precise answers to every question. The suggested approach is as follows:

First, most people think that there are certain obvious conditions of "illfare" for families, conditions that can readily be identified. For example, children should not be deprived of food or be malnourished. Poverty generally is bad for families. Illness and handicap are bad for children, as are deprivations of primary family relationships or physically dangerous environments. One

can say that consensus does indeed exist in these broad areas of concern. Thus, in these areas, the task of developing a family impact statement would be relatively clear-cut.

Second, in situations in which knowledge is uncertain and consensus does not exist, one could bring together scholars and other experts to work within the framework of uncertainty. In other words, given these limitations, what choices should be made with what possible consequences? How is limited knowledge best used? For example, there might be no consensus as to whether out-of-own-home care for very young children is "good" or "bad" for children, but one might obtain some agreement regarding the most desirable staff ratios if young children are placed in these programs, given specified appropriations, costs, demand, and so forth. The main focus would be on obtaining qualified consensus. One of the issues, of course, would be: whose consensus? Depending on the field, one could argue for scholars, government policy-makers, program specialists, consumers, or others.

Third, if knowledge is completely inadequate, consequences for families uncertain, partial consensus unobtainable, and if experts find it impossible to take even qualified positions, the approach would have to be to acknowledge these obstacles but also to insist on the necessity of learning from the experience. In this case, a variety of hypotheses might be formulated, and choices might even be made and acted on, but the goal of those responsible for issuing the family impact statement would be to assure careful monitoring of the implementation and consequences of the actions taken in order to learn from the experience and improve subsequent decision-making.

The Analytic Framework — In exploring different approaches to a family impact statement, the objective would be to develop a systematic, structured methodology for the identification, description, and measurement of family impact. One possibility is to create a special analytic framework that is unique to family-impact assessment. Another is to use an existing framework that permits analysis and inclusion of the major factors relevant to family-impact assessment. What follows is an exploration of the three analytic frameworks identified as potentially most useful — evaluation research, prediction and forecasting, and policy analysis.

Evaluation Research — In social science terminology, used in the context of evaluation research, "impact" generally is defined as the extent to which policies or programs are successful in achieving specified objectives. Often, in fact, impact is equated with effectiveness.[8]

Drs. Bernstein and Freeman state that the study and assessment of policy or program impact is one of the two major components of evaluation research, which they define as a decision-making, management tool encompassing "the systematic study of the operation of social-action, treatment, or intervention programs, and of their impact."[9] They define impact more precisely as the extent to which a program has or has not achieved its stated, pre-specified goal; the effects of changes that can be attributed to the implementation of a program; and the unanticipated consequences or side effects of the program.[10, 11]

Evaluation research should, therefore, help in several ways in family impact analyses.

First, the more effective the evaluation research and the more accessible its results, the firmer the knowledge base for impact predictions.

Second, in developing criteria and instruments, those who will work on impact statements will depend heavily on the experience of the evaluation field.

Third, the validity of the process of developing a family impact statement and its constant improvement as the process is repeated, elaborated, and refined, will depend on continuous evaluation research. Prediction, in short, must be constantly tested.

Prediction and Forecasting — These are terms used to mean that (1) given existing trends, certain developments are likely to occur; or (2) given certain actions, specified outcomes are likely to take place. By its nature, a family impact statement always is involved with prediction and forecasting. Although employed increasingly in both the public and private sectors, the techniques in this field still are in their infancy.[12] Where data are available, knowledge about relationships among variables is firm, and the relevant variables controllable, it is possible to construct a model for determining what occurs when new factors are introduced. Those who would develop a family impact statement will want to draw on existing knowledge of predictive work and, perhaps, to participate in testing of models.

Policy Analysis — As indicated, a family impact statement would draw on the analytic techniques of both evaluation research and forecasting. Yet still more would be required. Since the ultimate objective of a family impact statement is to improve the conditions of families, not just to assess the impact — or potential impact — of public policy, some approach must be sought that could employ the relevant

techniques in a framework directed specifically at improving decision-making regarding policies affecting families.

Policy analysis has been defined as an "approach, method and collection of techniques synthesizing available information including the results of research . . . to specify alternative policy and program choices . . .,"[13] to assess alternatives in terms of costs, benefits, feasibility, value implications, and to guide choices that best fit the selected criteria. Clearly, policy analysis may employ the same techniques and methodologies used in basic social science research. It differs, however, from social science research in that its primary objective is to facilitate decision-making, policy choice, and selection among programming options.[14]

By definition, all policy analysis is carried out within limitations — on time, available data, and on the analyst's knowledge.[15] Policy analysis is at best only an aid to decision-making. The final decision involves not only listing of choices and possible consequences but also requires individual judgment based on values and preferences, in addition to facts, regarding which choices are better or worse. Thus, at best, policy analysis can only help to identify possible or potential impact and the incentives, disincentives, or specifications that may lead to certain consequences. Yet it is precisely this concept of assessment in the context of limited knowledge, uncertainty, and lack of consensus that underscores the relevance of policy analysis as an analytic framework for a family impact statement.

Policy analysis offers two approaches for the development of a family impact statement. Where there is consensus regarding goals, the analytic task would be to assess policies, laws, and programs designed to achieve these goals and to ascertain the likelihood of their doing so. Where less is known, policy analysts could predict the results of policy or legislation so as to ensure avoidance of certain clearly defined negative effects on families.

In the second approach, where there is no consensus regarding objectives, the task would be to assess the potentially different consequences for families of various projected or planned policies. For example, there may be no consensus as to whether it is better for pre-school children to be cared for at home or in an organized child-care program. However, since more and more mothers of pre-school children are working, the analytic task may relate to identifying which policy maximizes child-care coverage for working mothers, or what the consequences might be if alternative policies were in ef-

fect, such as tax credits, vouchers, or direct support of providers of care. Given the caveats specified earlier, the concept of policy analysis is by far the most appropriate framework for a family impact statement. In effect, the "production" of a family impact statement is a form of policy analysis.

Producing a Family Impact Statement

(1) The organization auspices — There is no relevant experience that would indicate clearly which form of sponsorship would be most effective for the development of a family impact statement. Both intra- and extra-governmental sponsorship have been employed in the past in related efforts. (See below.) The major advantage of private, extra-governmental sponsorship is the ability to take a position regarding specified goals and to assess the extent to which governmental activities achieve these goals. On the other hand, public, intra-governmental efforts must remain more neutral, but, theoretically, should have greater influence on both governmental and non-governmental actions. Obviously, earlier efforts related in substance or structure to the proposed family impact function should be carefully analyzed before any decision as to sponsorship is made.

(2) Alternative models in the United States — Several alternative approaches that might provide models for the development of a family impact statement include:

— formal impact statements, with the foremost example being the Environmental Impact Statement;
— legislative analysis and review structures and processes, both intra-governmental (e.g., the Office of Child Development, the Subcommittee on Children and Youth) and extra-governmental (e.g., the Child Welfare League, the Children's Defense Fund);
— advisory and/or policy analysis efforts such as the Office of Technological Assessment, the Institute of Congress, and the National Academy of Sciences-National Research Council Advisory Committee on Child Development;
— regulatory agencies such as the Federal Drug Administration and the Federal Trade Commission.

The Environmental Impact Statement — While any attempt to put a family impact statement into effect should examine all of these models, this report will focus on actual impact statements.

The Environmental Impact Statement: The National Environmental Policy Act of 1969 (NEPA), implemented by Executive Order 11514 of March 5, 1970, and the Council on Environmental Quality's (CEQ) Guidelines of August 1, 1973,

require that all agencies of the federal government prepare detailed environmental statements on proposals for legislation and other major federal actions significantly affecting the quality of the human environment. NEPA requires that agencies include in the decision-making process an appropriate and careful consideration of all environmental aspects of proposed actions, an explanation of potential environmental effects of proposed actions and their alternatives for public understanding, a discussion of ways to avoid or minimize adverse effects of proposed actions, and discussion of how to restore or enhance environmental quality as much as possible.[16]

An environmental impact statement is defined as "a report prepared by the Environmental Protection Agency . . . which identifies and analyzes in detail the environmental impacts of a proposed . . . action and feasible alternative."[17] The statement involves a systematic, interdisciplinary approach integrating natural and social sciences, as well as other relevant fields. Another definition is that an environmental impact statement is a "document prepared by a federal agency on the environmental impact of its proposals for legislation and other major actions significantly affecting the quality of the human environment. Environmental impact statements are used as tools for decision-making and are required of the National Environmental Protection Agency."[18]

Thus, an environmental impact statement implies the in-advance review assessment of proposed legislation or programs to ascertain their consequences in a particular area. The definition suggests two general criteria for determining the need for an impact statement:

1. Where the proposed action will have significant effects on the environment, both primary or direct effects and secondary, or indirect effects. More specifically, although "significance" is defined to include both beneficial and detrimental effects, "preference should be given to preparing environmental impact statements on proposed actions which, on balance, have adverse effects."[19]
2. Where a proposed action is likely to be highly controversial.

The concern with negative or highly controversial consequences has particular value for a family impact statement in view of the difficulty in obtaining agreement around what is good or beneficial for children and families. Also, the idea of primary and secondary effects is close to the concept of direct and indirect impact. Primary impacts are defined as those that can be attributed directly to the proposed action. This definition, however,

does not address the issue of intention. Therefore, direct or indirect impacts could be either intended or unintended.[20]

The structure of an environmental impact statement is also relevant to the development of a family impact statement. For example, the regulations state that:

> The body of the EIS shall identify, develop and analyze pertinent issues discussed in the seven sections below; each section need not be a separate chapter. This analysis should include, but not be limited to, consideration of the impact of the proposed project on the environmental areas which are relevant to the project. The EIS shall serve as a means for the responsible official and the public to assess the environmental impacts of a proposed EPA action, rather than as a justification for decisions already made. It shall be prepared using a systematic, interdisciplinary approach and shall incorporate all relevant analytic disciplines to provide more meaningful and factual data, information and analyses. The presentation of data should be clear and concise, yet include all facts necessary to permit independent evaluation and appraisal of the beneficial and adverse environmental effects of alternative actions. The amount of detail provided should be commensurate with the extent and expected impact of the action and the amount of information required at the particular level of decision making. To the extent possible, an EIS shall not be drafted in a style which requires extensive scientific or technical expertise to comprehend and evaluate the environmental impact of a proposed EPA action.[21]

Where analytic strategies or techniques are concerned, the environmental impact statement process has spawned methodologies ranging from the very general and non-quantitative to the specific and quantitative. The hierarchy specified by the Illinois Institute for Environmental Quality is multidisciplinary teams, check lists, assessment tables, and matrices. An additional method might be the construction of various models delineating the consequences of different policies.

Finally, what is known about the implementation of an environmental impact statement and related federal policy suggests some of the limitations to be considered in the development of a family impact statement. Criticisms of the effectiveness of environmental impact statements are many. Some say that these impact statements fail to present sufficient information to allow a neutral decision-maker to judge the importance of the environmental benefits and costs of a proposed project.[22] Others question whether the environment is better off as a consequence of the use of environmental impact statements. Still others describe the

approach as simplistic, incapable of estimating the cumulative impact of multiple actions or the probability of impact. Of general concern are the long delays encountered before the process resulting in a statement is finally completed, the statement's openness to misuse by special-interest groups, and the tendency to stress a particular position and try to sell it regardless of its real value.

Despite these criticisms and such inherent problems as the cost of preparing a statement and the difficulty of assessing unanticipated consequences, many people believe firmly that the environmental impact statement procedures have raised the general level of awareness of the environmental effects of economic development. The concept has been widely accepted by public-policy makers and environmentalists as a technique for managing growth, even though the technique often is misused or underused. Although still in an embryonic stage of development, ". . . the environmental impact statement concept is an important improvement in procedures for arriving at more informed choices among a series of alternatives and it encourages environmentally sound development."[23]

Other Impact Statements — The so-called Women's Impact Statement (the Evaluation of Program Impact on Women, developed for use by the Department of Health, Education and Welfare) and the Human Subjects Review process (developed and required by HEW for all research studies involving human subjects) are two other illustrations of impact statements. They are essentially descriptive statements in which certain areas of concern are identified and the respondent is expected to apply his own criteria in deciding whether effects are positive or negative. If negative, a similar approach is employed to indicate what is being done to offset these consequences, what the rationale is for proceeding with the action, considering these negative consequences, and what alternative approaches might be used. Neither approach includes precise criteria for assessing negative impact and for making a final decision as to whether action should be approved, disapproved, or changed.

Other Related U.S. Efforts — There are several other relevant examples of federal programs that might offer lessons for the development of a family impact statement, or at least of an impact analysis process:

— the Federal Drug Administration makes advance analyses and assessments of new drugs and their effects before permitting them to be marketed;

— the Federal Trade Commission reviews advertising claims in order to assess accuracy and to prevent distortion and misleading claims;
— consumer protection agencies do advance analyses of pending legislation to make visible potential consequences for individual consumers.

Alternative Models — In Europe, no formal family impact statement has been developed by any European country, nor is there much interest evinced in the development of such a statement. European scientists, like many of those in the United States, do not believe the current state of knowledge permits the development of rigorous, quantifiable measures of effects, much less predictive measures. Beyond these doubts, most citizens and government officials feel no need for scientific validation of what they usually are sure are readily identifiable, sound policies for families.

Despite the absence of family impact statements, several countries have explicit family policies in which there is a concern for the consequences of government actions for families or society. Various formal and informal processes exist for monitoring, reviewing, and analyzing legislation, and for describing, assessing, and making visible potential effects. A brief description of three countries' approach to the development of family policy follows:

In Austria, it is assumed that what is good for families is readily known and acceptable to all. The issue then is how to make potentially negative consequences visible so as to assure appropriate modification of pending legislation. For this purpose, there is a quasi-governmental Advisory Committee on Family Affairs that reviews all pending legislation to identify those bills having potential consequences for families. Once identified, bills are reviewed by appropriate specialized subcommittees and are distributed for review to various voluntary organizations concerned with the family and with children. Where there is controversy, still further review and analysis may take place before the Committee issues a final report, presenting recommendations to the Chancellor.

In Sweden, special commissions are set up to study controversial issues and, on the basis of the study, to recommend new legislation. This activity is part of the overall planning process in Sweden and includes both policy analysis and policy research on specific legislative proposals that have already undergone political "negotiation."[24]

A third approach is being explored in Hungary. In many ways it has a more interesting potential for systematic analysis and prediction of the consequences of public policies for

families than the approaches described in Austria and Sweden. Current efforts, however, are very preliminary. In Hungary, concern about emerging unanticipated consequences of certain family policies has led to retrospective analysis of the relevant legislation and evaluation of its impact on other government policies and programs. The approach begins with a descriptive, non-quantitative analysis, but the long-term objective is to improve predictive capacities and techniques through the use of simulation models.

Although not a model as such, nor an outgrowth of family policy, there is a fourth perspective suggested by the British, one that highlights both an alternative structure as well as an alternative rationale for developing a family impact statement. This approach suggests that even where there is no explicit family policy, restrictions in resource availability may foster a search for improved decision-making in issues of public policy. One obvious objective would be the attainment of greater coherence of policies, or what has been called elsewhere the "harmonization" of policies.[25] In Britain, the search for coherence has led to a suggestion regarding the preparation of policy papers supported by better statistical data, especially social statistics. The suggestion has been made that these papers be required to contain "some estimate — however crude at first — of the distributional effects" of every proposal submitted to the relevant departments and ministers.[26]

Developing a Family Impact Statement

Formulation — A family impact statement would involve analysis of selected pending legislation, policies, regulations, programs, in order to make explicit:

- the potential effects or outcomes, both negative and positive, (with stress on the negative) of actions taken or pending (laws, policies, regulations) that might impinge on families (directly or indirectly);
- the potential for unanticipated consequences (both negative and positive) of such actions; and
- the potential lack of coherence or conflict with existing laws, policies, and programs.

Summary — All governmental activity, in some way, takes account of consequences or impacts. The form may be descriptive, rhetorical, financial, or other. The family impact statement is intended to improve this process. Development of a family impact statement is predicated on the assumption that it would be worthwhile to try to predict the likely consequences of govern-

ment activity for families, and that the process of prediction could be improved over time. Successful development of a family impact statement requires a systematic policy analysis in which consequences are made explicit. Alternative values would be identified, with an indication of how each could be realized or what the consequences of potential actions might be for varying sets of values.[27] Where choices conflict, the final decision would have to be made in the political arena.

The ultimate goal of a family impact statement should be to improve the conditions of families. The method selected to achieve this is to influence decision-making regarding public policy for families and children. Thus, the immediate goal of a family impact statement should be to raise national consciousness regarding policies affecting families and children by making the consequences of public policies explicit.

Recommendations —

1. Efforts to develop a family impact statement should build on the findings of separate but related projects and studies. Development of criteria for identifying federally-funded evaluations that should have taken note of program impact on children, but did not, could contribute to the establishment of criteria for assessing potential family impact. Improving evaluation research related to children could contribute to increasing knowledge regarding positive child development and benign programs. In addition, there should be continuous scrutiny of work in such related methodological and substantive areas as the enlargement of the data base on families and children, studies of human development, techniques of policy analysis, and work in the field of family policy.
2. Given the limited state of knowledge, a selective and limited focus should be used in initial efforts to develop a family impact statement. Early efforts might have the following priorities:
   - A focus on direct impact, with attention to problems of criteria and measures for indirect impact taken up at a later stage.[28]
   - The establishment of an early consensus on what is clearly bad for families and children. Subsequent focus on what is good would be undertaken when this harder-to-define element can be clearly identified.

— Primary attention to issues and situations where there is great public controversy, even if no firm consensus exists. Recommendations and conclusions would reflect either uncertainty or suggestions for monitoring and learning.
— An attempt to identify conflicts and inconsistencies in existing legislation affecting families.

3. Alternative sponsorship should be explored and tested. Existing experiences would seem to indicate that auspices *per se* do not determine successful or effective monitoring, planning, or policy advocacy, although a poor choice of sponsorship might contribute to failure.
4. The Model — No single model is recommended. Instead, exploration and testing of alternative models is urged, for at present, no model can provide precise statements as to the consequences of government action on families. The important point is to develop a model that will facilitate asking the right questions and will constantly correct predictions through feedback. Among alternative U.S. approaches that could be tested are:
   — a descriptive, non-quantitative model based on expert judgment and assessment;
   — a structured and analytic model based on the use of check lists and similar instruments;
   — a descriptive-analytic model drawing on a combination of quantitative and non-quantitative methods;
   — simulation models, both with and without the use of computers.

Footnotes

1. The basic study was completed for the Foundation for Child Development. Other related research activities are funded by the Office of Child Development, DHEW, the Carnegie Corporation, and the Ford Foundation.
2. See, for example, the rationale for the newly established Institute for Congress, as described in *The New York Times*, December 28, 1975.
3. U.S. Senate, Subcommittee on Children and Youth, *American Families: Trends and Pressures* (Washington, D.C.: GPO, 1974).
4. Urie Bronfenbrenner, Marvin Sussman, Margaret Mead, *Ibid.*
5. A. Sidney Johnson, III, is directing a two-year Family Impact Seminar that will seek to identify and assess the effects on families and children of a variety of public policies. The principal focus of the project will be on the political and administrative aspects of the question, although the Seminar will, necessarily, include in its work analysis of the concept of various kinds of family impact statements. The Foundation for Child Development is the prime sponsor of the Seminar, which is also being supported by a two-year grant from the Lilly Endowment. The Seminar is part of the George Washington University's Institute for Educational Leadership in Washington, D.C.
6. Nicholas Zill and Orville G. Brim, Jr., *Childhood Social Indicators* (New York: Foundation for Child Development, 1975).
7. For discussion of family policy, see Sheila B. Kamerman and Alfred J. Kahn, "Explorations in Family Policy." *Social Work*, May 1976.
8. T.K. Glennan, Jr. "Evaluating Federal Manpower Programs," in Peter H. Rossi and Walter Williams, eds. *Evaluating Social Programs* (New York and London: Seminar Press, 1973), p. 190.
9. Ilene N. Bernstein and Howard E. Freeman, *Academic and Entrepreneurial Research* (New York: Russell Sage Foundation, 1975), p. 83; see also pp. 19-20.
10. *Ibid.*, p. 1.
11. With a grant from the Foundation for Child Development, Dr. Freeman is conducting a 26-month study at the Institute for Social Science Research of the University of California at Los Angeles to monitor evaluation research on and about children. He and his colleagues are examining the scope, quality, and substantive contributions of evaluation research of federal programs that have direct and indirect relevance for child development.
12. See, for example, Seymour Spilerman, *Forecasting Social Events* (Madison, Wisconsin: Institute for Research on Poverty), Reprint 139.
13. Walter Williams, *Social Policy Research Analysis* (New York: American Elsevier Publishing Co., Inc., 1971), p. 12.
14. For further discussion of this distinction see Williams, *op. cit.*, and Erwin C. Hargrove, *The Missing Link: The Study of the Implementation of Social Policy* (Washington, D.C.: The Urban Institute, 1975).

15. See Frank Levy, "Observations of a Participant," in *Policy Analysis*, Spring, 1975, p. 439.
16. Environmental Protection Agency, preparation of an Environmental Impact Statement, final regulations. *Federal Register*, Vol. 40, No. 72, Part III, Monday, April 14, 1975, p. 16814.
17. *Ibid.*, p. 16815.
18. Robert W. Burchell and David Listokin, *The Environmental Impact Handbook* (New Brunswick, N.J.: Center for Urban Policy Research, 1975), p. 3.
19. Environmental Protection Agency, *op. cit.*, p. 16816.
20. *Ibid.*, p. 16819.
21. *Ibid.*, paragraph 6. 304 body of EIS page 16819.
22. *Op. cit.*, Burchell and Listokin, Preface.
23. *Ibid.*
24. An illustration of something similar to the Swedish experience can be seen in the U.S. in the reports prepared for the Congress of the U.S., Joint Economic Committee, *Studies in Public Welfare* (Washington, D.C.: GPO, 1972-1975). In the U.S., however, legislative proposals do not follow such reports as they do in Sweden.
25. Hugh Heclo, "Frontiers of Social Policy in Europe and America," *Policy Sciences*, Vol. 6, No. 4, December 1975, 403-422.
26. Central Policy Review Staff, *A Joint Framework for Social Policies* (London: HMSO, 1975).
27. The issue of intended and unintended consequences is more complex. As indicated earlier, even where incentives and disincentives are employed deliberately one can never be sure that individual or group behavior will, in fact, respond as projected. For a fascinating illustration of the unanticipated consequences of policies deliberately established to achieve specified objectives, see Elliott Abrams and Franklin S. Abrams, "Immigration Policy. Who Gets in and Why?," *Public Interest*, No. 38, Winter 1974, pp. 3-29. In this discussion of the unanticipated consequences of immigration legislation in the U.S. the dangers and problems inherent in prediction are highlighted. The authors imply that the best possibility is to focus on identifiable incentives and disincentives and make explicit the variables that cannot be controlled. Here, too, analysis can make these variables explicit (e.g., technological innovations, world conditions, natural disasters, leadership, etc.). Regardless, unanticipated consequences will occur (or consequences anticipated by some will be ignored).
28. The distinction between direct and indirect impact does not imply that one or the other is "better" or "worse." There is no consensus around this or around direct or indirect intervention. For some discussion of this point see the opposing positions taken regarding the value of direct and indirect housing subsidies in William C. Baer, "On the Making of Perfect and Beautiful Social Programs," *Public Interest*, No. 39, Spring 1975, pp. 80-98, and A.P. Solomon, *Housing and Urban Poor: A Critical Evaluation of Federal Housing Policy* (Cambridge: The M.I.T. Press, 1974).